

REMARKS

Claims 1-29 are pending in the present application. Applicants have amended Claims 1, 10, 14 and 23-27, and added Claims 28 and 29, herewith.

Reconsideration/consideration of the pending claims is respectfully requested.

Applicants would initially like to thank the Examiner for taking the time to conduct a telephonic interview on September 23, 2004. While no agreement was reached, Applicants' representative described differences between the claimed invention and the teachings of the cited references (with particular focus on the teachings of the cited Heistermann reference.

I. Claim Objection

Claims 10 and 23 were objected to by the Examiner due to a missing comma on line 2. Applicants have amended such claims to include a comma as requested.

II. 35 U.S.C. § 101

The Examiner rejected Claims 23-26 under 35 U.S.C. § 101 as being directed towards non-statutory subject matter. This rejection is respectfully traversed.

Applicants have amended Claims 23-26 to expressly recite a 35 USC § 101 statutorily recognized apparatus. Because of recitation of an apparatus, as opposed to a method, there is no requirement to describe a set of actions that 'use' these objects, as alluded to by the Examiner in rejecting such claims. In addition, Claim 23 recites a first object describing *metadata for a plurality of data sources*, and a set of second objects describing *metadata for respective properties of the data sources*. Thus, the structures described by the two objects are interrelated to one another. Therefore, rejection of Claims 23-26 under 35 U.S.C. § 101 has been overcome.

III. 35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 1-22 and 27 under 35 U.S.C. § 103 as being unpatentable over Sun Microsystems, "Version 1.1.8 of Java Platform API

Specification", 1995-1999 (hereinafter Jdk118), in view of Heistermann et al., USPN 6,477,701 (hereinafter Heistermann). This rejection is respectfully traversed.

With respect to Claim 1, Applicants show that such claim recites (i) using methods defined by the object descriptor interface to identify a property of the object, and (ii) using methods defined by the property descriptor interface to obtain metadata associated with the identified property. None of the cited references teach or suggest this combination of methods, defined by an object descriptor interface and a property descriptor interface, to synergistically obtain metadata associated with an object property. In rejecting Claim 1, the Examiner acknowledges that Jdk118 is lacking in this regard, but states that Heistermann teaches the use of API methods to identify a property related to a object derived from a descriptor class or obtain metadata associated with such property, citing Heistermann col. 7, line 9 to col. 8, line 9 and Figs 9 and 11. Applicants urge that this cited passage does not teach or otherwise suggest any technique for obtaining metadata associated with property that comprises a multi-step process of using methods defined by a (object) descriptor interface to identify an object property and then using methods defined by another (property) descriptor interface to obtain metadata associated with such identified property (that was identified using methods defined by the object descriptor interface). Rather, Heistermann teaches that a method of an object may be invoked to obtain a list of properties for a class (column 8, lines 1-3). This single method invocation to obtain class properties does not teach or otherwise suggest the claimed multi-step process using methods defined by a (object) descriptor interface to identify an object property and then using methods defined by another (property) descriptor interface to obtain metadata associated with such identified property. To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974). As all the claim limitations are not taught or suggested by the cited references, it is shown that a prima facie case of obviousness has not been made with respect to Claim 1.

Applicants traverse the rejection of Claims 2-9 for reasons given above with respect to Claim 1 (of which Claims 2-9 depend upon).

With respect to Claim 10, Applicants have amended such claim to clarify the synergistic relationship between the first object and the set of second objects, in that a method is called in the first object to identify a respective property, and then a method is invoked in a second object to dynamically obtain metadata concerning the respective property. In rejecting Claim 10, the Examiner states that the concept of dynamic defining of metadata being invoked by beans APIs is implied in the teachings of the cited references. Applicants urge that Claim 10 goes further, and expressly recites synergistic co-action between multiple objects to obtain such dynamic metadata, which is not implied by the teachings or suggestions of the cited references. Thus, amended Claim 10 is shown to not be obvious in view of the cited references.

Applicants traverse the rejection of Claims 11-13 for reasons given above regarding Claim 10 (of which Claims 11-13 depend upon).

Applicants traverse the rejection of Claims 14 (and dependent Claims 15-22) and 27 for similar reasons to those given above regarding Claim 1.

Therefore, the rejection of Claims 1-22 and 27 under 35 U.S.C. § 103 has been overcome.

IV. 35 U.S.C. § 102, Anticipation

The Examiner rejected Claims 23-26 under 35 U.S.C. § 102 as being anticipated by Sun Microsystems, "Version 1.1.8 of Java Platform API Specification", 1995-1999 (hereinafter Jdk118). This rejection is respectfully traversed.

Applicants urge that the cited reference does not teach both (1) an object describing *metadata for a plurality of data sources*, and (2) a set of second objects describing *metadata for respective properties of the data sources*. In rejecting Claim 23, the Examiner cites Jdk118's `java.beans.BeanDescriptor` and `java.beans.PropertyDescriptor` as reading on the claimed object and second set of objects, respectively. Applicants urge that Jdk118's description of a `BeanDescriptor` and `PropertyDescriptor` does not teach or otherwise disclose the claimed synergistic relationship between objects, and in particular does not teach that one of these objects describes metadata for a plurality of data sources and that the other one describes metadata for respective properties of such data sources. For a prior art reference to

anticipate in terms of 35 U.S.C. 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). As every claimed element is not identically shown in a single reference, it is shown that Claim 23 is not anticipated by the cited reference.

Applicants traverse the rejection of Claims 24-26 for reasons given above regarding Claim 23 (of which Claims 24-26 depend upon).

Therefore, the rejection of Claims 23-26 under 35 U.S.C. § 103 has been overcome.

V. Newly Added Claims

Applicants have added Claims 28 and 29 herewith. Examination of such claims is respectfully requested.

VI. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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